

JOHN F. MILLS (1939-2003) EDWARD J. GROARKE Christopher P. O'Hara CAROL O'ROURKE PENNINGTON Filed 11/20/23 Page 1 of 1 Steven C. Farkas** Thomas P. Keane*** Damien O. Maree** Patricia L. Boland Sabrina K. Bekios + GLENN A. KREBS++

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+ AWAITING ADMISSION ++OF COUNSEL

November 20, 2023

VIA ECF

Honorable Robert W. Lehrburger United States Magistrate Judge **United States District Court** Southern District of New York 500 Pearl Street New York, New York 10007-1312

> Re: EEOC v. Local 580, et al. Civil Action No. 71 Civ. 2877

Dear Judge Lehrburger:

This firm represents the International Association of Bridge Structural and Ornamental Ironworkers Local 580 ("Local 580") and the Local 580 Joint Apprentice-Journeyman Educational Fund ("AJEF") in the referenced matter. We write jointly with Special Master David Raff to submit a status report in response to the Court's Order dated June 28, 2023, directing Local 580 and the Special Master to meet and confer about the Special Master's Application regarding Local 580's audit of the office of the Special Master's and Member Assistance Program's books and records (the "Application"). (Dkt. No. 511).

Under the current scheduling Order, the parties were required to have all issues related to the requested audit and MAP budget resolved by November 22, 2023. (Dkt. No. 525). The budgeting and MAP issues are complicated and require time and close attention to work on the details. The parties have continued to diligently work on the outstanding issues, but rather than ask for another extension, Local 580 and the AJEF have agreed to withdraw their request to audit at this time and without prejudice. Accordingly, Special Master Raff is herein withdrawing his Application. As a result, no Court intervention is needed on this issue currently.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/Patricia L. Boland Patricia L. Boland

cc: All parties of record (via ECF)